

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

IN RE: §
§ Case No. 21-60052
SCOTT VINCENT VAN DYKE § (Chapter 7)

MEDIATED SETTLEMENT AGREEMENT

The parties, Scott Vincent Van Dyke (the "Debtor") and Michael Lee Noel ("Noel") (each individually a "Party" and collectively referred to as the "Parties") having mediated and reached an agreement, the Parties now agree as follows:

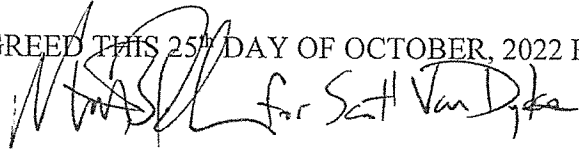
1. Debtor to pay a total of \$67,000.00 to Noel on or before December 31, 2022.
2. Noel to release the abstract of judgment on file as to the Debtor's homestead within five (5) business days of execution of this agreement and to file a release of judgment lien in the real property records releasing the abstract of judgment lien in full within ten (10) business days of receipt of payment of the settlement funds in full to Noel.
3. Upon payment of the settlement funds in full, Noel to file a stipulation of dismissal with prejudice of the non-dischargeability adversary proceeding he has against the Debtor in Adversary Proceeding Number 21-6008.
4. Noel to maintain his proof of claim filed as an unsecured claim in the bankruptcy case, and the Debtor shall not object to that proof of claim.
5. Noel agrees not to object to the motion to approve the compromise of controversy with Eva S. Engelhart, Chapter 7 Trustee of the Estate of Anglo-Dutch Petroleum International, Inc. and agrees not to object to the motion to approve the compromise of controversy with Catherine Curtis, Chapter 7 Trustee of the Estate of Scott Vincent Van Dyke to be filed following this mediation.
6. Debtor's counsel will prepare and file a motion to approve compromise, proposed form of order and other documents required by the bankruptcy court within 7 days of today.
7. The Parties will notify the Bankruptcy Court of this settlement and request a standstill pending a ruling by the Bankruptcy Court on the motions to approve compromise referenced in paragraph 5 and 6, above.
8. Any disputes regarding this agreement will be resolved by Judge Jones in his capacity as mediator.



9. Each Party agrees to pay its own attorney's fees and costs. For the avoidance of confusion, Noel does not waive any rights to payment of attorney's fees and costs from the bankruptcy estate as provided in his proof of claim.

10. Both Parties will take all actions necessary to effectuate the terms of this Agreement and will cooperate to complete its approval.

AGREED THIS 25TH DAY OF OCTOBER, 2022 BY:

 for Scott Van Dyke

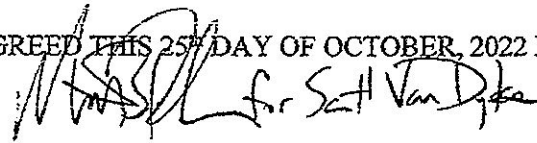
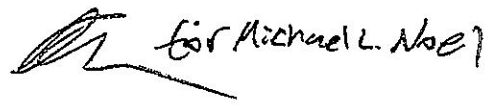
By: 
Scott Vincent Van Dyke

By: _____
Michael Lee Noel

9. Each Party agrees to pay its own attorney's fees and costs. For the avoidance of confusion, Noel does not waive any rights to payment of attorney's fees and costs from the bankruptcy estate as provided in his proof of claim.

10. Both Parties will take all actions necessary to effectuate the terms of this Agreement and will cooperate to complete its approval.

AGREED THIS 25TH DAY OF OCTOBER, 2022 BY:

 for Scott Van Dyke  for Michael L. Noel

By: _____
Scott Vincent Van Dyke

By:  _____
Michael Lee Noel